

FCC Public Comment
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Broadcast Localism

To: FCC Localism Task Force

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As a career broadcaster, with on-air, operational and administrative experience in both radio and television, the issue of presenting programming relevant to local community issues is one with which I have dealt on a personal and professional level for some 40 years.

I have observed that localism is normally interpreted to mean news and public affairs, which is often presented in brief segments between entertainment programs that, by contrast, usually reflect national programming interests. On television such local programming is normally surrounded by network or syndicated shows that are repeated across the country. On radio, local issues have largely migrated to AM news and talk stations, which are also augmented by nationally distributed programs. On FM, the program fare is mostly music, which is almost universally controlled by the major recording studios and licensing authorities, and often programmed by national corporations that own and operate local stations.

Radio in particular is missing an opportunity to offer a type of localism in programming that is almost non-existent anywhere in the country. In virtually every community from coast to coast are local musicians who perform and earn their livelihood by entertaining local live audiences, but are almost never heard on local media. Local stations instead seem locked into nationally produced and promoted music, excluding local artists from any on-air exposure unless and until they become signed by major labels and achieve some level of national recognition for their recordings.

The purpose of this comment is to propose that local radio stations should be given a mandate to not only offer news and public affairs of local interest, but also to offer local entertainment programming by local artists, notably local musicians who have produced broadcast quality recordings, but until now have been nearly totally prohibited from ever having their product heard on local radio.

Further, it is recommended that the FCC Localism Task Force proceed with an investigation and analysis of those factors that tend to create the current prohibition against local music programming, including but not limited to program management practices by stations that are owned by national broadcast companies and policies and regulations the support national music programming to the exclusion of locally produced music on local stations

It is further suggested that certain national legislation protecting copyrights and performance royalties on radio and television, and recently in internet streaming practices, also tend to favor nationally promoted and distributed music programming and discourage such programming of local talent. Consideration should be given to providing waivers of certain licensing requirements where local musicians are performing material protected by national copyright on local broadcast stations, in particular local radio.

The issue of localism should not be confined to news and public affairs, but should also include the entire array of entertainment programming offered by broadcast stations in local communities across the country.

Recommendations presented by the FCC Localism Task Force should also seek to offer relief to those conditions in the present industry and legal establishments that discourage local artists, notably musicians, from gaining access to the public broadcast spectrum.

Thank you for your consideration in regards to these comments.